

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 19-00087-01-CR-W-HFS
	)	
CAROL L DILLE,	)	
	)	
Defendant.	)	

**MOTION TO MODIFY BOND and ADD  
COUNTY TO PERMITTED TRAVEL**

COMES NOW the defendant, Carol L. Dille, by and through her counsel, Travis D. Poindexter, Assistant Federal Public Defender for the Western District of Missouri, and moves this Court, to include Johnson County, Missouri, in Ms. Dille's permitted travel counties. Ms. Dille owns property in Johnson County, Missouri, that she intends to sell. In order to facilitate a sale, Ms. Dille needs to be able to travel to the property. In support, Ms. Dille offers the following:

**SUGGESTIONS IN SUPPORT**

1. On March 6, 2019, a seven-count indictment was filed charging the defendant with three counts of Wire Fraud in violation of 18 U.S.C. §§ 1343; one count of Theft of Government Money in violation of 18 U.S.C. §§ 641; one count of Aggravated Identity Theft in violation of 18 U.S.C. §1028A; and two counts of Bankruptcy Fraud – False Oaths and Claims in violation of 18 U.S.C. § 152.

2. On March 13, 2019, Ms. Dille was granted a personal recognizance bond at the time of her Initial Appearance.

3. To date, Ms. Dille has been fully compliant with her conditions of release.

4. Ms. Dille requests permission to include Johnson County, Missouri, in Ms. Dille's permitted travel counties.

5. Counsel has contacted Ms. Dille's Pretrial Officer, Angela Palmerton, and she has no objection to Ms. Dille's additional travel county.

WHEREFORE, the defendant, Carol L. Dille, respectfully requests this Court, to grant her permission to include Johnson County, Missouri, in Ms. Dille's permitted travel counties.

Respectfully submitted,

**/s/ Travis D. Poindexter**

Travis D. Poindexter  
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ATTORNEY FOR DEFENDANT

### **CERTIFICATE OF SERVICE**

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that the foregoing motion was electronically filed and sent on the ECF system.

**/s/ Travis D. Poindexter**

Travis D. Poindexter